REMARKS

Claims 1-11, 13-21, 23-25, 27-31, and 33-60 are pending and have been rejected.

Claims 1-3, 5, 7, 8, 10, 13-21, 27, 28, 30, 33-39, 41, 43-45, 47, 49-51, 53, 55-57, and 59 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin et al. (US 2004/0199521) in view of Chang et al. (US 6,578,046) and Goodwin et al. (US 6,199,195). It is respectfully submitted that claims 1-3, 5, 7, 8, 10, 13-21, 27, 28, 30, 33-39, 41, 43-45, 47, 49-51, 53, 55-57, and 59 are allowable over the art of record for the reasons set forth below.

Claim 1 is directed to a computer system that comprises items, item folders, and categories. Each item belongs to at least one of the item folders, and at least one of the items belongs to a category. The item folders and the categories are arranged in a directed graph structure (see application, as originally filed, e.g. at paragraph [0111]). The prior art fails to disclose or suggest such features.

The Office Action acknowledges that "Anglin and Chang do not explicitly teach the Item Folders and the Categories arranged in a directed graph structure" (Office Action, page 5, lines 1-2).

The Office Action states that Goodwin teaches item folders and categories arranged in a directed graph structure, and points to the relationships described by Goodwin (column 4, lines 30-31 and 34-44). Goodwin describes that relationships can be one-to-one, one-to-many, or many-to-many.

However, both Anglin and Chang are directed to hierarchies of information as opposed to directed graph structures. Anglin and Chang are unrelated to directed graph structures, and because of their consistent use of hierarchies, it is respectfully submitted that they both teach away from directed graph structures. Because both Anglin and Chang are completely unrelated to directed graph structures, as well as teach away from the use of directed graph structures, there is no motivation or suggestion to combine Anglin and Chang with Goodwin. Any teaching, suggestion, or motivation to combine Anglin and Chang with Goodwin would be based solely on Applicant's disclosure using hindsight reconstruction — and is thus improper.

Claims 21, 37, 43, 49, and 55 include similar features to those described above with respect to claim 1. Based on the foregoing, claims 1, 21, 37, 43, 49, and 55 should not be

rejected as being unpatentable over Anglin in view of Chang and Goodwin. Thus, claims 1,
21, 37, 43, 49, and 55, along with their dependent claims, are patentable for the reasons set
forth above. Withdrawal of the rejections of claims 1-3, 5, 7, 8, 10, 13-21, 27, 28, 30, 33-39,
41, 43-45, 47, 49-51, 53, 55-57, and 59 under 35 U.S.C. § 103(a), is respectfully requested.

Claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 have been rejected under
35 U.S.C. § 103(a) as being unpatentable over Anglin et al. in view of Chang et al., Goodwin
et al., and Edwards (US 2004/0073560). It is respectfully submitted that claims 4, 6, 9, 11,
29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 are allowable over the art of record for the reasons
set forth below.

Claims 4, 6, 9, 11, 29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 are variously dependent
from claims 1, 21, 37, 43, 49, and 55, and are therefore patentable for the reasons set forth
above with respect to these claims. Edwards describes file synchronization by using a folder
tree descriptive of each set of folders that is stored at various locations, but fails to teach or
suggest the directed graph structure as claimed. Edwards fails to cure the deficiencies of
Anglin, Chang, and Goodwin. Therefore, withdrawal of the rejections of claims 4, 6, 9, 11,
29, 31, 40, 42, 46, 48, 52, 54, 58, and 60 under 35 U.S.C. § 103(a) is respectfully requested.

Claim 23 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over
Anglin in view of Chang et al., Goodwin et al., and Beauregard et al. (US 6,438,545). Claim
24 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anglin in view of
Chang et al., Goodwin et al., and Gordon and Syme (Typing a Multi-Language Intermediate
Code). Claim 25 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over
Anglin in view of Chang et al., Goodwin et al., and Judge et al. (US 6,430,564). It is
respectfully submitted that claims 23-25 are allowable over the art of record for the reasons
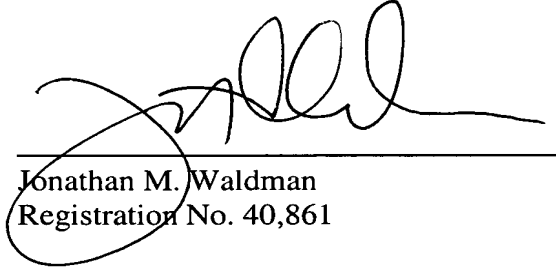set forth below.

Claims 23-25 are dependent from claim 21, and are therefore patentable for the
reasons set forth above. Beauregard describes a user interface, Gordon and Syme describes
rules for an intermediate language, and Judge describes a data manager. However,
Beauregard, Gordon and Syme, and Judge, each fail to cure the deficiencies of Anglin,
Chang, and Goodwin. Therefore, withdrawal of the rejections of claims 23-25 under 35
U.S.C. § 103(a) is respectfully requested.

DOCKET NO.: MSFT-1748/302722.01
Application No.: 10/647,058
Office Action Dated: October 16, 2006

PATENT
REPLY FILED UNDER EXPEDITED
PROCEDURE PURSUANT TO
37 CFR § 1.116

In view of the foregoing remarks, Applicants submit that the above-identified application is in condition for allowance. Early notification to this effect is respectfully requested.

Date: December 15, 2006

Jonathan M. Waldman
Registration No. 40,861

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439